Case 25-10348-pmm Doc 9 Filed 01/28/25 Entered 01/28/25 13:53:41 Desc Main Document Page 1 of 3

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : CHAPTER 11

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MARK'S POOL SERVICE, LLC

BANKRUPTCY NO. 25-10348 (PMM)

:

Debtor

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR

Pursuant to 11 U.S.C. § 329(a) and Rule 2016(b) of the Federal Rules of Bankruptcy Procedure, I certify that I am the attorney for the above-captioned Debtor and that compensation paid to my firm within one (1) year before the filing of the Petition in bankruptcy, or agreed to be paid to my firm, for services rendered or to be rendered on behalf of the Debtor in contemplation of or in connection with the instant bankruptcy case is as follows:

- 1. The legal services which Maschmeyer Marinas P.C. ("<u>M&M</u>") will provide on the Debtor's behalf include, but are not limited to, the following services:
 - (a) Advise the Debtor of its rights, powers, and duties as a debtor-in-possession in continuing to operate and manage its assets;
 - (b) Advise the Debtor concerning, and assisting in the negotiation and documentation of the use of cash collateral and/or debtor-in-possession financing, debt restructuring and related transactions;
 - (c) Review the nature and validity of agreements relating to the Debtor's businesses and advise the Debtor in connection therewith;
 - (d) Review the nature and validity of liens, if any, asserted against the Debtor and advise as to the enforceability of such liens;
 - (e) Advise the Debtor concerning the actions it might take to collect and recover

property for the benefit of its estate;

- (f) Prepare on the Debtor's behalf all necessary and appropriate applications, motions, pleadings, orders, notices, petitions, schedules, and other documents or pleadings, and review all financial and other reports to be filed in the Debtor's Subchapter V case;
- (g) Advise the Debtor concerning, and preparing responses to, applications, motions, pleadings, notices and other papers which may be filed in the Debtor's Subchapter V case;
- (h) Counsel the Debtor in connection with the formulation, negotiation and promulgation of a plan of reorganization and related documents; and
- (i) Perform all other legal services for and on behalf of the Debtor, which may be necessary or appropriate in the administration of its Subchapter V case.
- 2. It is contemplated that M&M will be compensated for the services described above at its ordinary billing rates and in accordance with its customary billing practices with respect to its out-of-pocket expenses, all pursuant to the provisions of the Bankruptcy Code, and the Federal and Local Rules of Bankruptcy Procedure, subject to this Court's approval.
- 3. On January 8, 2025, M&M received the sum of \$25,000.00 as a pre-petition retainer (the "Retainer") -- which was immediately deposited in the firm's IOLTA account, (i) to asses and address certain matters raised by various creditors of the Debtor, and (ii) for any professional services to be rendered in connection with the Debtor's restructuring efforts.
- 4. After the receipt of the Retainer, M&M applied a portion of the Retainer to invoices issued for professional services incurred in the ordinary course of business for work performed in assessing and addressing certain matters raised by various creditors of the Debtor. As a result, on the date the Voluntary Petition was filed, M&M was holding the sum of

Case 25-10348-pmm Doc 9 Filed 01/28/25 Entered 01/28/25 13:53:41 Desc Main Document Page 3 of 3

\$15,000.00 -- as the original Retainer was reduced by the sum of \$10,000.00.

- 5. M&M has not agreed to share the above-disclosed compensation with any other person unless they are a member of the firm.
- 6. Any and all compensation to be paid to M&M for services rendered on the Debtor's behalf shall be fixed by application to this Court in accordance with 11 U.S.C. §§ 330 and 331, the Federal and Local Rules of Bankruptcy Procedure as may then be applicable, and/or any alternative arrangement for interim compensation as may be authorized by the Court.

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to M&M for the representation of the Debtor in this bankruptcy proceeding.

MASCHMEYER MARINAS P.C.

By: /s/ Paul B. Maschmeyer

PAUL B. MASCHMEYER

FRANK S. MARINAS
629A Swedesford Road
Swedesford Corporate Center
Malvern, PA 19355
(610) 296-3325

Dated: January 28, 2025